

EXHIBIT A



April 15, 2025

Michael B. Shortnacy

VIA CERTIFIED AND ELECTRONIC MAIL

2121 Avenue of the Stars
Suite 1400
Los Angeles, California 90067
t 424.285.8330
d 424.324.3494
f 424.204.9093
mshortnacy@shb.com

**Re: MDL 3084 – Order re Withdrawal of Counsel in
Case No. 3:24-CV-07553-CRB**

Dear C.A.:

We write on behalf of our client, Uber Technologies Inc. (“Uber”), regarding *C.A. v. Uber Technologies, Inc., et al.*, 3:24-CV-07553-CRB, which you filed in *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB (“the MDL”). On January 17, 2025, Anapol Weiss moved to withdraw its representation of you on the grounds that you have “failed to respond to Counsel’s numerous communication attempts via telephone, email, and text.” *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB, ECF 2105 at 2 (Exhibit 1). On April 8, 2025, the Court granted that motion. *In re Uber Technologies, Inc. Passenger Sexual Assault Litigation*, 3:23-md-03084-CRB, ECF 2724 at 1 (Exhibit 2). It is our understanding that you have not found replacement counsel and are no longer represented by an attorney. If that understanding is incorrect, please provide this communication to your attorney, and have your attorney contact us via the information provided above or below as soon as possible.

The Court’s Order states that “Within 28 days of this order, the plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If the plaintiff does not file that notice, the Court will dismiss their case without prejudice.” Exhibit 2 at 1. The Court also ordered Uber’s counsel to “provide a copy of this order to the plaintiff[.]” *Id.* The Court’s Order is attached to this correspondence as Exhibit 2. Per this Order, you must “file a notice indicating whether [you] intend to pursue the action with new counsel or representing [yourself]” within 28 days of April 8, 2025, i.e. by Tuesday, May 6, 2025, or else “the Court will dismiss [your] case without prejudice.”

We ask that you please email us confirmation of your receipt of this letter, via email to mshortnacy@shb.com, jjtaylor@shb.com, and kfrazier@shb.com at your earliest opportunity. If you would like to discuss the letter’s contents further, please let us know, and we would be happy to organize a meet and confer.

Sincerely,

SHOOK, HARDY & BACON LLP

By: /s/Michael Shortnacy
Michael Shortnacy

EXHIBIT 1

WILLIAM L. SMITH (Cal Bar No. 324235)
ANAPOL WEISS
6060 Center Drive 10th Floor,
Los Angeles, CA 90045
Telephone: 202.780.3014
Facsimile: 202.780.3678
Email: wsmith@anapolweiss.com

HOLLY DOLEJSI (*Admitted Pro Hac Vice*)
ANAPOL WEISS
60 South 6th St., Suite 2800
Minneapolis, MN 55402
Telephone: 202.780.3014
Facsimile: 202.780.3678
Email: hdolejsi@anapolweiss.com

Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL: No. 3084 CRB

Honorable Charles R. Breyer

This Document Relates to:

C.A. v. Uber Technologies, Inc., et al.
Case No. 3:24-cv-07553

**MOTION TO WITHDRAW AS
COUNSEL OF RECORD**

Pursuant to Local Rule 11-5, William L. Smith and Holly Dolejsi of Anapol Weiss, counsel of record for Plaintiff C.A. (“Counsel”), respectfully moves this Court for an Order allowing their firm to withdraw as counsel of record in the above-captioned matter.

Over the past several months, Plaintiff C.A. has failed to comply with Counsel’s numerous requests to produce her PFS form. Counsel advised Plaintiff on December 12, 2024, that her PFS form was past due and requested Plaintiff’s assistance in submitting the items that were identified during a meet and confer with opposing counsel earlier that afternoon. Counsel continued to

1 follow-up with Plaintiff but has not received a response to date. Plaintiff C.A. has failed to
2 respond to Counsel's numerous communication attempts via telephone, email, and text messages.

3 On December 20, 2024, Counsel advised Plaintiff in writing of their intent to withdraw
4 from this matter via electronic mail if she did not respond by December 27, 2024. At the time of
5 this filing, Plaintiff has still not responded to Counsel. Counsel has advised Defendants of his
6 firm's intent to withdraw from this matter during follow-up meet and confer discussions if he did
7 not hear from Plaintiff.

8 WHEREFORE, the law firm of Anapol Weiss; and all attorneys of record for Plaintiff
9 request that they be allowed to withdraw as counsel of record for Plaintiff C.A. A copy of this
10 motion will be served upon Plaintiff at her last known address and via electronic mail.

11
12 Dated: January 17, 2025

Respectfully submitted,

13 **ANAPOL WEISS**

14 By: /s/ William L. Smith
15 WILLIAM L. SMITH (Cal Bar No. 324235)
16 6060 Center Drive 10th Floor
17 Los Angeles, CA 90045
18 Telephone: 202.780.3014
19 Facsimile: 202.780.3678
20 Email: wsmith@anapolweiss.com

21 HOLLY DOLEJSI (*Admitted Pro Hac Vice*)
22 60 South 6th St. Suite 2800
23 Minneapolis, MN 55402
24 Telephone: 202.780.3014
25 Facsimile: 202.780.3678
26 Email: hdolejsi@anapolweiss.com

27 *Counsel for Plaintiff*
28

CERTIFICATE OF SERVICE

I hereby certify that on January 17, 2025, I electronically transmitted the forgoing MOTION TO WITHDRAW to the Clerk's Office using the CM/ECF System for filing thereby transmitting a Notice of Electronic Filing to all CM/ECF registrants.

/s/ William L. Smith
William L. Smith

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084

**ORDER RE WITHDRAWAL OF
COUNSEL**

This Order Relates To:

Re: Dkt. No. 2105

C.A. v. Uber, Inc.,
Case No. 3:24-cv-07553-CRB

Plaintiff's counsel's motion to withdraw is granted. Within 28 days of this order, the plaintiff shall file a notice indicating whether they intend to pursue the action with new counsel or representing themselves. If the plaintiff does not file that notice, the Court will dismiss this case without prejudice.

Uber's counsel shall provide a copy of this order to the plaintiff and file a declaration within 7 days of this ruling explaining how they did so.

IT IS SO ORDERED.

Dated: April 8, 2025



CHARLES R. BREYER
United States District Judge